

1 KEKER & VAN NEST LLP
ROBERT A. VAN NEST - # 84065
2 rvannest@kvn.com
CHRISTA M. ANDERSON - # 184325
3 canderson@kvn.com
DANIEL PURCELL - # 191424
4 dpurcell@kvn.com
633 Battery Street
5 San Francisco, CA 94111-1809
Telephone: (415) 391-5400
6 Facsimile: (415) 397-7188

7 KING & SPALDING LLP
BRUCE W. BABER (pro hac vice)
8 bbaber@kslaw.com
1185 Avenue of the Americas
9 New York, NY 10036
Tel: (212) 556-2100
10 Fax: (212) 556-2222

11 Attorneys for Defendant
GOOGLE INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,
16 Plaintiffs,
17 v.
18 GOOGLE, INC.,
19 Defendant.

Case No. 3:10-cv-03561 WHA

**DECLARATION OF EDWARD A.
BAYLEY IN SUPPORT OF ORACLE'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
RESPONSE RE: ECF NO. 1349**

Dept. Courtroom 8, 19th Fl.
21 Judge: Hon. William Alsup

1 I, EDWARD A. BAYLEY, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and am an
3 associate at the law firm of Kecker & Van Nest LLP, counsel to Google Inc. ("Google") in the
4 above-captioned action. I submit this declaration in support of Oracle's Administrative Motion to
5 File Under Seal Portions of Its Response RE: ECF No. 1349. Dkt. No. 1363. I have knowledge
6 of the facts set forth herein, and if called upon as a witness, I could testify to them competently
7 under oath.

8 2. The redacted portions of Oracle's Response to Court's Order re Damages Studies,
9 Dkt. No. 1364, contain Google's sensitive, non-public financial data, such as revenues associated
10 with Android. This includes the redacted material at 2:11-16. Public disclosure of this
11 information would cause great and undue harm to Google and place it at a competitive
12 disadvantage. The Court has previously granted Google's requests to file under seal similar
13 financial information. *See, e.g.*, Dkt. No. 935, Dkt. No. 1056, Dkt. No. 1122. These selections
14 should therefore be filed under seal.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct to the best of my knowledge.

17 Executed this 13th day of November, 2015 at San Francisco, California.

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20 By: /s/ Edward A. Bayley
21 EDWARD A. BAYLEY
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